

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

ANDREW TATE AND TRISTAN TATE,

Plaintiffs,

v.

Case No.: 9:23-cv-81150-RLR

Defendants.

**DECLARATION OF [REDACTED]
IN SUPPORT OF DEFENDANTS' MOTION FOR PSEUDONYMITY AND MOTION
FOR PARTIAL SEAL AND PROTECTIVE ORDER**

I, [REDACTED], hereby declare and state the following in support of Defendants' Motion for Pseudonymity and Motion for Partial Seal and Protective Order in the above-captioned matter:

1. My name is [REDACTED] and I have been named as a Defendant in the above-captioned matter.

2. I am an adult citizen of [REDACTED], currently residing in the [REDACTED], and I am competent to testify to the facts set forth in this declaration.

3. I have suffered and continue to suffer significant and severe injury, loss, and interference of my daily life as a result direct result of Andrew Tate.

4. In or around March 2022, I became of a victim of abuse and human trafficking at the hands of Andrew Tate in Romania at the age of 20 years old¹.

¹ Due to the pending criminal prosecution of the Tate Brothers in Romanian, details surrounding my abuse at the hands of Andrew Tate are being withheld at this time.

5. I was able to escape my captor and abuser, Andrew Tate, in or around April 2022, when the Romanian government raided Andrew Tate and Tristan Tate's compound in Bucharest, Romania.

6. After the Romanian law enforcement authorities raided the Tates' compound, I provided a statement to Romanian law enforcement about my abuse at the hands of Andrew Tate, and have since cooperated with law enforcement officials.

7. Since that time, I have experienced ongoing severe symptoms of depression, anxiety, and post-traumatic stress, requiring ongoing medical treatment.

8. These symptoms have been exacerbated by the dissemination of my personal identifying information, both on social media and through being named as a Defendant in the above-captioned lawsuit.

9. Since my identity was made public, I have experienced harassment, public humiliation, and degrading attacks on my character and reputation from Andrew Tate's fans and supporters.

10. Specifically, my name, my parents' names, my place of employment, school, and my social media accounts were posted on a public twitter account. Within three days of its posting, it had over one million views.

11. A lawyer for the Tate Brothers also released my personal identifying information after filing this lawsuit, including my date of birth, passport information, and [REDACTED] number.

12. I have also received multiple death threats, including the below threats, by way of example:

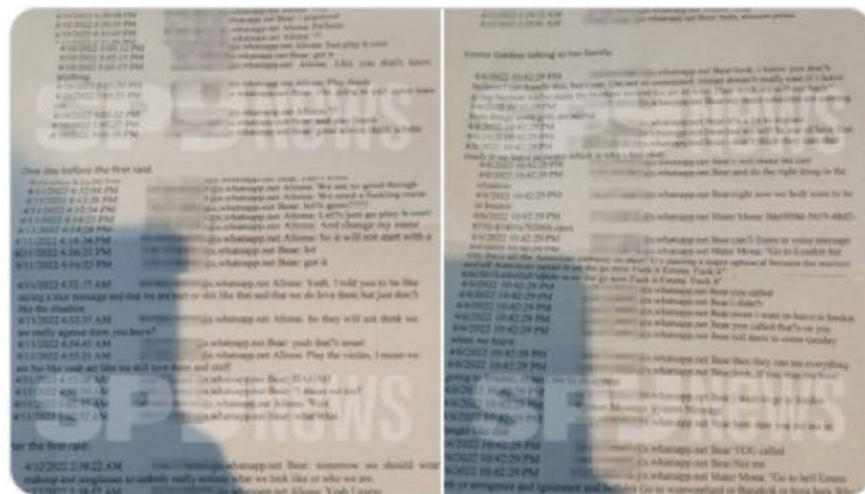


The Cobra Council @TheCobraCouncil • Feb 15

• BREAKING UPDATE

Wiretaps reveals that both the [REDACTED]
 PLANNED to FRAME The Tate Brothers **f!**

These documents are crazy ::,



Andrew Tate and 3 others

0 49 t.l. 178 0 986 36.5K



der unbekannte

@alla eno

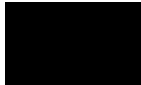
Replying to @TheCobraCouncil1@ShaykhSulaiman and 4 others

Where can i Find This two? I swear i will make self justice for tates they dont deserve This

3:35 PM • Feb 15, 2023 • 1,769 Views



View 1 reply...



Andy Michael

God will punish you for falsely accusing Tate Brothers...all the suffering they faced just for your clout and money comeback to bite you remember that ..

1 d Like Reply



View 1 reply...

Med Amami

Falsely accusing a man who moved you to romania after being a druggie stripper, even tho videos of you twerking naked happily in his house Karma will fuck you badly soon enough

1 d Like Reply

Write a reply...

Lamelo Ball

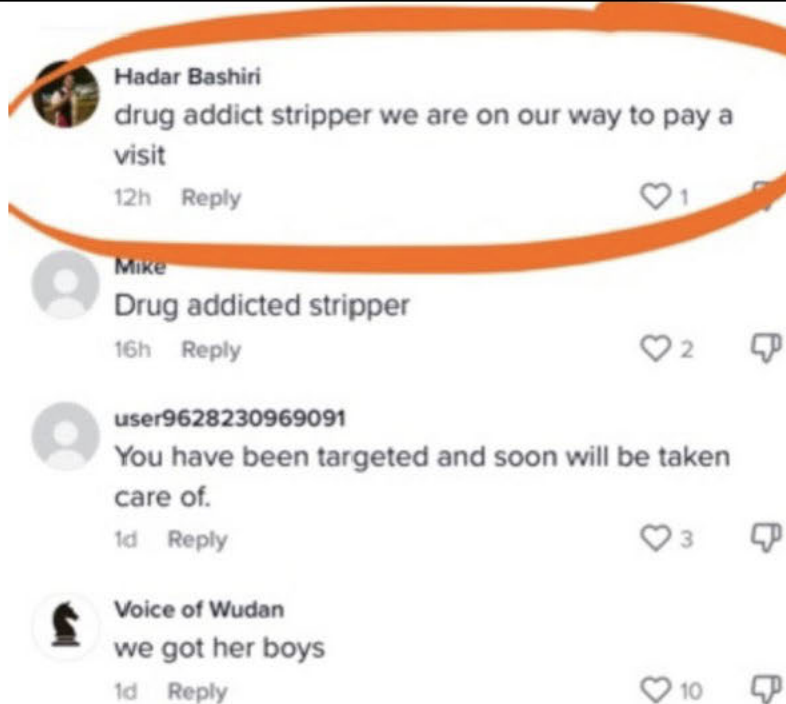
Karma will come back at you for trying to destroy two innocent men. When they are free (which they will be) we will know the truth and you will get whats coming to you.

1 d Like Reply

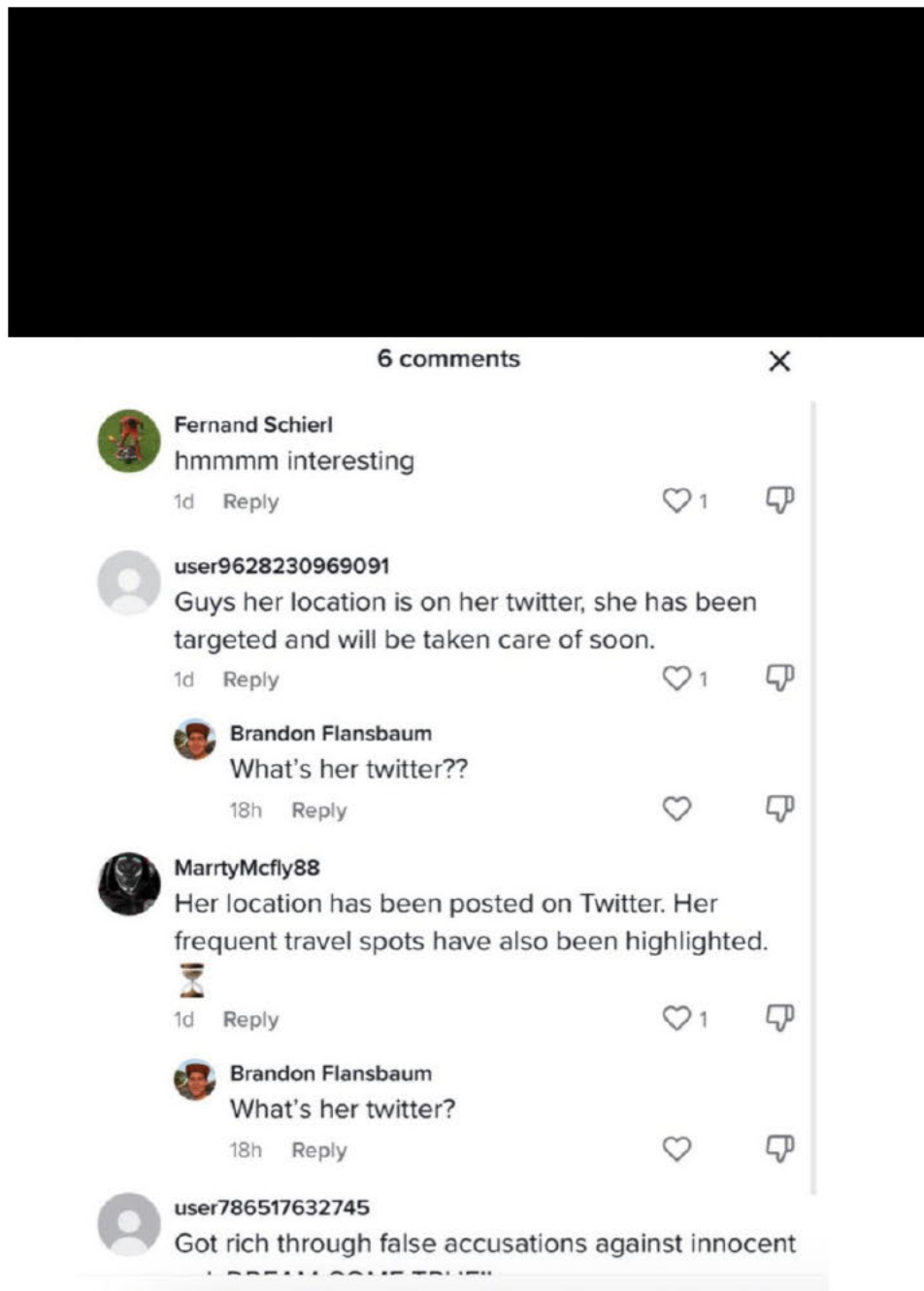


Write a comment...





13. One individual on social media posted that he had found my location through Twitter and threatened that I would be “taken care of soon”.



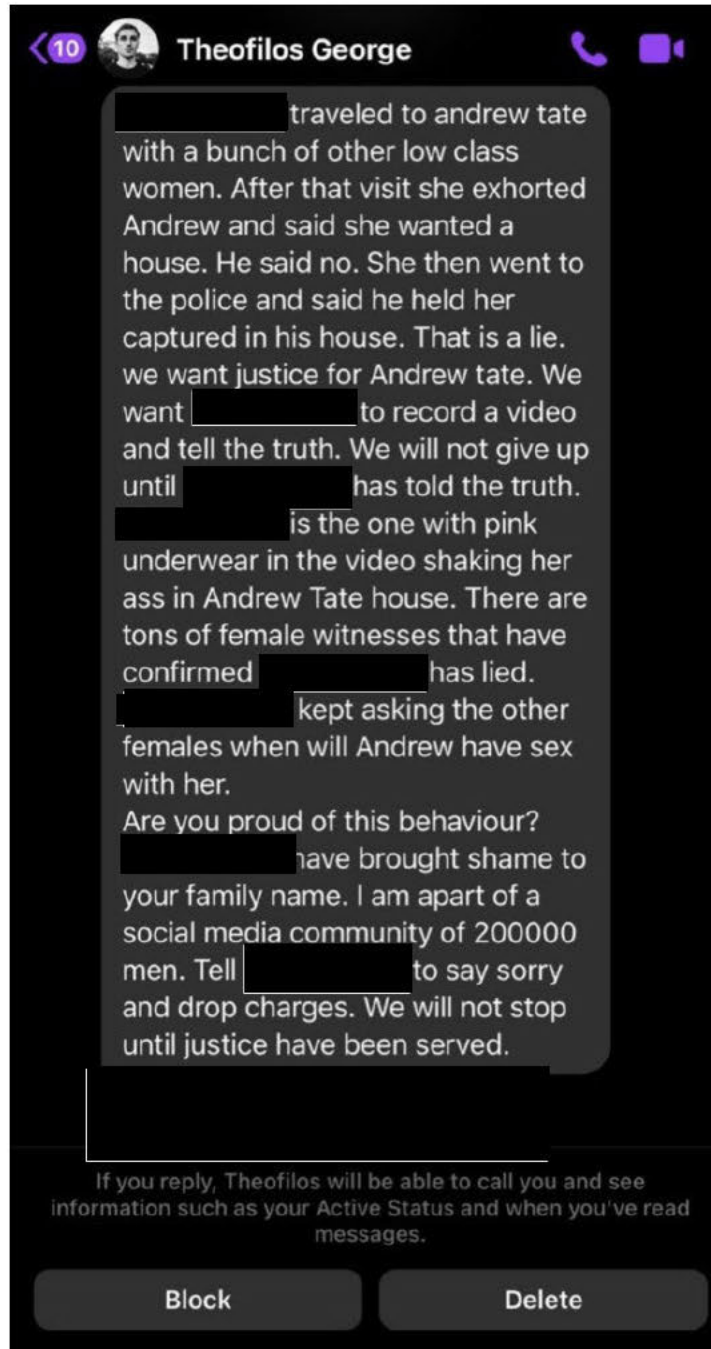
14. In fear for my safety due to these threats, I was forced to relocate from my home for multiple months, take intermittent leaves of absence from my job, and make changes to how I travel in and around my community.

15. The harassing and threatening messages have profoundly impacted my ability to go to work, attend school, maintain relationships, or have any semblance of a peaceful or healthy life.

16. There have been vile and degrading lies spread about me across the internet, including accusations that I am a drug addict, prostitute, and stripper, none of which are, or have ever, been true.

17. I have also received threats from strangers that lies about me and sexually explicit images of me would be disseminated to my friends, family, school, and employer if I did not record a video retracting my statement to authorities.

18. One individual followed through with that threat when I refused to retract my statement and sent a sexually explicit video of me to my family members through social media:



19. Andrew Tate's "Hustlers University" is a social media "community" of approximately 200,000 men who pay a monthly subscription to get advice from the Tate Brothers on how to make money by manipulating women.

20. Additionally, during my relationship with Plaintiff Andrew Tate, he discussed with me that there is significant mafia presence [REDACTED], and he had multiple connections to mafia members [REDACTED], which adds to my fears that my life and my family members' lives are in danger.

21. As a result of the ongoing abuse, harassment, degrading insults, and threats, I have been experiencing night terrors, insomnia, change in appetite, severe depression, anxiety, panic attacks, isolation due to my fear of being out in public, and suicidal thoughts.

22. I would feel more secure and better protected from ongoing and future threats during the pendency of this litigation if I were able to proceed by pseudonym and have my personal information shielded from the public, so that Andrew Tate cannot continue to hurt, abuse and revictimize me through the American civil justice system.

23. I respectfully beg of this Court to afford me any protections available under the law, or as the Court feels is just.

24. I solemnly affirm under penalty of perjury that the contents of the foregoing declaration are true to the best of my knowledge, information, and belief.

Date: September 8, 2023

Respectfully submitted,

[REDACTED]
